

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA**

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**CRIMINAL NO: 11-120**

**v.**

\*

**SECTION: "K"**

**SAMANTHA LEWIS**

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**FACTUAL BASIS**

If this case were to proceed to trial, the United States would prove the following facts beyond a reasonable doubt:

On or about December 16, 2009, MARK ROSS was arrested by agents with the Drug Enforcement Administration following an investigation of his activities distributing heroin in the Eastern District of Louisiana. Prior to his arrest, ROSS shared a residence at 1950 Robert E. Lee Blvd., New Orleans, Louisiana with defendant **SAMANTHA LEWIS**. **LEWIS** had been ROSS's girlfriend prior to his 2003 conviction in the United States District Court for the Eastern District of Louisiana for possession with the intent to distribute heroin and possession of ammunition by a convicted felon. **LEWIS** admits that in 2009 she knew ROSS made money by distributing narcotics and ROSS used the proceeds of drug dealing to purchase automobiles, clothes, and accessories for **LEWIS** and himself.

At trial in this matter, agents would testify that during their investigation ROSS acquired and possessed a 2009 Jaguar automobile VIN SAJWA06B49HR03123. An investigation into the Jaguar's purchase revealed that three cashier's checks were acquired on June 17, 2009 at Chase Bank branches in New Orleans to facilitate its purchase. Chase deposits are insured by the Federal Deposit Insurance Corporation (FDIC). At trial, witness testimony and physical evidence would be produced to show that one of the cashier's checks (#9477602236) in the amount of \$7,808.00 was purchased by **LEWIS**. **LEWIS** had a Chase customer account, but presented united states currency to purchase the cashier's check. The cashier's check was issued to Copart, an online auction site for vehicles.

A second cashier's check (#9477602237) was purchased by S.W. in the amount of \$7,807.00. The second check was also issued to Copart. S.W. had an account at Chase, but presented united states currency to purchase the cashier's check. **LEWIS** knew S.W. and had known him to assist ROSS in hiding his assets. Prior to ROSS going to federal prison in 2003, S.W. had registered a Hummer ROSS possessed in S.W.'s name. S.W. was at the bank when **LEWIS** went inside to purchase the first cashier's check used to obtain the Jaguar.

A third cashier's check (#9096402202) was also purchased on June 17, 2009, by MARK ROSS in the amount of \$7,808.00. The third check was also issued to Copart and was purchased with united states currency. ROSS provided the money, proceeds of ROSS's drug dealing, used to purchase the three cashier's checks.

Once ROSS took possession of the Jaguar, it was titled and registered in the name of S.W. On the day ROSS was arrested by the Drug Enforcement Administration for violating the

federal controlled substances act, the Jaguar was in ROSS's possession.

**Read and Approved:**

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SAMANTHA LEWIS (Date)  
Defendant

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ROBERT EARLY # (Date)  
Counsel for Samantha Lewis

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EMILY K. GREENFIELD #28587 (Date)  
Assistant United States Attorney